

EXHIBIT C

KNIGHT LAW GROUP, LLP

Steve Mikhov (SBN 224676)
stevem@knightlaw.com
Daniel Kalinowski (SBN 305087)
danielk@knightlaw.com
10250 Constellation Blvd., Suite 2500
Los Angeles, California 90067
Telephone: (310) 552-2250
Fax: (310) 552-7973

Attorneys for Plaintiff,
MARGARITA VELASQUEZ

ROSEWALDORF LLP

Michael J. Gregg (SBN 321765)
mgregg@rosewaldorf.com
Mark W. Skanes (SBN 322072)
mskanes@rosewaldorf.com
100 Oceangate, Suite 300
Long Beach, California 90802
Telephone: (518) 869-9200
Fax: (518) 869-3334

Attorneys for Defendant,
FCA US LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MARGARITA VELASQUEZ,

Plaintiff,

v.

**FCA US LLC, a Delaware Limited
Liability Company; and DOES 1
through 10, inclusive,**

Defendant.

Case No.: 2:21-cv-05092-JFW-AGR

**STIPULATION REGARDING
PLAINTIFF'S ATTORNEY'S FEES,
COSTS AND EXPENSES**

Honorable Judge John F. Walter

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Plaintiff MARGARITA VELASQUEZ (“**Plaintiff**”) and Defendant FCA US LLC (“**Defendant**”) (collectively, “**the Parties**”), by and through their respective counsel of record, hereby enter into the following stipulation for entry of an Order by the Court as follows:

WHEREAS, this matter was settled on or about August 31, 2021.

WHEREAS, per the Rule 68 Offer entered into by the Parties, Defendant agrees that the judgment may include an award of attorneys’ fees, costs and expenses recoverable by agreement between the parties or motion as allowed by law.

WHEREAS, the Parties now seek to resolve the issue of Plaintiff’s attorney’s fees, costs and expenses without further litigation on terms just and fair to all parties and hereby enter into the following Stipulation of Attorney’s Fees, Costs and Expenses (“the Stipulation”).

THEREFORE, THE PARTIES HEREBY STIPULATE TO THE ENTRY OF AN ORDER AS FOLLOWS:

- (1) That Defendant shall pay the sum of \$8,250.00 to Plaintiff and Plaintiff hereby agrees to accept said payment in full satisfaction of all claims for attorney’s fees, costs and expenses in connection with this action;
- (2) That Defendant shall pay the sum of \$8,250.00 to Plaintiff within 60 days of August 31, 2021 unless matters outside of the control of Defendant cause delay;
- (3) Each of the undersigned represents that he or she has been duly authorized to enter into the Stipulation.

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1 **IT IS SO STIPULATED.**

2 Dated: September 3, 2021

KNIGHT LAW GROUP, LLP

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5 /s/ Daniel Kalinowski

6 Steve Mikhov (SBN 224676)

7 Daniel Kalinowski (SBN 305087)

8 Attorneys for Plaintiff,

MARGARITA VELASQUEZ

9 Dated: September 3, 2021

ROSEWALDORF LLP

10
11 /s/ Mark Skanes

12 Michael J. Gregg (SBN 321765)

13 Mark W. Skanes (SBN 322072)

14 Attorneys for Defendant,

FCA US LLC